Federal Operating Permit
Article 1

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1 of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act and 9 VAC 5-80-50 through 9 VAC 5-80-300 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name:	Green Bay Packaging Inc.
Facility Name:	Green Bay Packaging Inc. Winchester Coated Products Division
Facility Location:	285 Park Center Drive Fort Collier Industrial Park Frederick County, Virginia
Registration Number:	81158
Permit Number:	VRO81158

May 18, 2004
Effective Date

May 18, 2009
Expiration Date

R. Bradley Chewning
Director, Department of Environmental Quality

April 16, 2004
Signature Date

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Permit Conditions, 55 pages
NSPS Subpart RR
NESHAPS Subpart JJJJ

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I. Facility Information

Permittee
Green Bay Packaging Inc.
P.O. Box 19017
Green Bay, Wisconsin 54307-9017

Responsible Official
Paul J. Hasemeyer
Senior Vice President

Facility
Green Bay Packaging Inc.
Winchester Coated Products Division
P.O. Box 3568
Winchester, Virginia 22604-2575

Contact Person
Tom Schibly
Division Manager
(540) 678-2600

AFS Identification Number: 51-069-0108

Facility Description: SIC Code 2672 (Coated and Laminated Paper, NEC) and NAISC 322222 (Coated and Laminated Paper Manufacturing)

Green Bay Packaging Inc. Winchester Coated Products Division manufactures pressure sensitive materials for the Roll Label industry. The material is manufactured in wide web, bulk roll form on a large machine called a tandem coating line. All coatings and laminating are done in one process. This process is broken down into various stages. Liner rolls are mounted on a turret and are coated with a solventless silicone. The silicone is applied to a gravure roll, which is deposited to a rubber roll and in turn is transferred to the liner. Dryer #1 cures the silicone on the liner. After a cooling and moisturizing stage, the liner is coated with a water-based adhesive by one of three methods. These methods are the Gravure, Mayer rod, or a slot die mechanism. Dryer #2 dries the adhesive. Facer rolls are mounted on the turret. A primer coating is applied to the backside of the face stock. The prime coat consists of a light coatweight of a clay slurry applied by either Mayer rod or Gravure methods. Dryer #3 dries the prime coat. The face material then comes in contact with the silicone-coated liner carrying adhesive in the laminating station. The combined product is rewound into larger diameter rolls. Emission sources include the coating operations and the gas-fired dryers.

II. Emission Units

Equipment to be operated consists of:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Tandem Coating Line							
1		Egan Machinery Company #920282 (constructed 1992) (NSPS Subpart RR) with a total gas-fired rated capacity of 14.4 mmBTU per hour, consisting of:		---	---	---	01/21/04
	1A/1B	A- Adhesive Application/Dryer #2	563 gallons/hour				
		B - Primer Application/Dryer #3	187 gallons/hour				
	1C	C- Silicone Application/Dryer #1	19 gallons/hour				
Tandem Coating Line							
2		Faustel (or equivalent) (NSPS Subpart RR) with a total gas-fired rated capacity of 14.4 mmBTU per hour, consisting of:		---	----	---	01/21/04
	2A/2B	A- Adhesive Application/Dryer #2	563 gallons/hour				
		B - Primer Application/Dryer #3	187 gallons/hour				
	2C	C- Silicone Application/Dryer #1	19 gallons/hour				

*The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

III. Process Equipment Requirements – Tandem Emulsion Coating Line (Unit 1)

A. Limitations

1. Volatile organic compound (VOC) emissions from the operation of the tandem emulsion coating line, as calculated on a weighted monthly average, shall not exceed 0.20 pound of VOC per pound of coating solids applied.
   (9 VAC 5-80-110, 40 CFR 60.442(a)(1), and Condition 7 of 01/21/04 Permit)

2. Each coating, as delivered by each coating applicator of the tandem emulsion coating line, shall not exceed 2.9 pounds of volatile organic compounds per gallon of coating, excluding water.
   (9 VAC 5-80-110 and 9 VAC 5-40-4330 A)

3. Volatile organic compound emissions from the tandem emulsion coating line shall be controlled by the use of water-based adhesives and low solvent coatings.
   (9 VAC 5-80-110, 9 VAC 5-40-4340, and Condition 3 of 01/21/04 Permit)

4. The permittee shall take reasonable precautions to minimize volatile organic compound emissions from cleaning or purging operations. Reasonable precautions may include the following:

   a. The use of detergents, high pressure water, or other non-volatile cleaning methods;

   b. The minimization of the quantity of volatile organic compounds used to clean lines of equipment; and

   c. The adjustment of production schedules to minimize coating changes thereby reducing the need for frequent cleaning or purging of a system.

   (9 VAC 5-80-110 and 9 VAC 5-40-4330 E)

5. Volatile organic compounds shall not be intentionally spilled, discarded to sewers, stored in open containers, or handled in any other manner that would result in evaporation beyond that consistent with air pollution control practices for minimizing emissions.
   (9 VAC 5-80-110 and Condition 4 of 01/21/04 Permit)

6. Emissions from the operation of the tandem emulsion coating line shall not exceed the limits specified below:

Particulate Matter (coating operations)	123.0 lbs/day	21.8 tons/yr
PM-10 (coating operations)	123.0 lbs/day	21.8 tons/yr
Volatile Organic Compounds (coating operations)		92.4 tons/yr

Annual emissions shall be calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-110 and Condition 8 of 01/21/04 Permit)

7. Visible Emissions from each tandem emulsion coating line stack shall not exceed 5 percent opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-80-110, 9 VAC 5-50-80, 9 VAC 5-40-60, and Condition 10 of 01/21/04 Permit)

8. Authorization to modify Unit 1 shall become invalid, unless an extension is granted by the DEQ, if:

   a. A program of continuous modification is not commenced before the latest of the following:

      (1) July 21, 2005;

      (2) Nine months from the date that the last permit or other authorization was issued from any other governmental agency;

      (3) Nine months from the date of the last resolution of any litigation concerning any such permit or authorization; or

   b. A program of modification is discontinued for a period of 18 months or more, or is not completed within a reasonable time, except for a DEQ approved period between phases of a phased construction project.

   (9 VAC 5-80-110 and Condition 20 of 01/21/04 Permit)

B. Monitoring and Recordkeeping

1. Each calendar month, the permittee shall determine compliance with the VOC limit in Condition III.A.1 by calculating the weighted average of the mass of solvent used per mass of coating solids applied using the following formula:

$$G = \frac{\sum_{i=1}^{n} W_{oi} M_{ci}}{\sum_{i=1}^{n} W_{si} M_{ci}}$$

(Equation III-1)

Where:

G = the calculated weighted average mass (lb) of VOC per mass (lb) of coating solids applied each calendar month.

M_{ci} = the total mass (lb) of each coating (i) applied during the calendar month as determined from facility records.

W_{oi} = the weight fraction of VOC applied of each coating (i) applied during a calendar month as determined by using Reference Method 24 or by the coating manufacturer's formulation data.

W_{si} = the weight fraction of solids applied of each coating (i) applied during a calendar month as determined by using Reference Method 24 or by the coating manufacturer's formulation data.

(9 VAC 5-80-110, 40 CFR 60.443(a), and Conditions 15 and 17 of 01/21/04 Permit)

2. The permittee shall determine compliance with the VOC limits in Condition III.A.6 by calculating the VOC emissions as follows:

$$E = \sum_{i=1}^{n} M_{ci} W_{oi}$$

(Equation III-2)

Where:

E = the VOC emissions in pounds per time period

M_{ci} = the total mass (lb) of each coating (i) applied during each time period as determined from facility records.

W_{oi} = the weight fraction of VOC applied of each coating (i) applied during each time period as determined from coating manufacturer's formulation data or alternative method approved by the Department.

Annual emissions shall be calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-110)

3. The permittee shall determine compliance with the PM and PM-10 limits in Condition III.A.6 by calculating the PM and PM-10 emissions as follows:

$$E = F \times S$$

(Equation III-3)

Where:

E = the PM or PM-10 emissions in pounds per time period

F = weight fraction of PM and PM-10 for each silicone coating used

S = amount of silicone coating applied in pound per time period

Annual emissions shall be calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-110)

4. The permittee shall monitor and maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Valley Regional Office. These records shall include, but are not limited to:

   a. Certified Material Safety Data Sheets (MSDS)/VOC Data Sheets or other equivalent documentation showing VOC content, water content, and solids content for each coating used.

   b. Coating records sufficient to show compliance with the volatile organic compound content limit contained in Condition III.A.2.

   c. Daily throughput (in pounds), weighted average VOC and solids fractions, and the VOC to solids ratio of each coating used in the tandem emulsion coating line.

   d. Daily and annual emissions (in pounds) of VOC, PM, and PM-10 from the tandem emulsion coating line. Annual emissions shall be calculated monthly as the sum of each consecutive 12-month period.

e. Monthly and annual throughput and VOC content of cleaning solvents used (in pounds), calculated monthly as the sum of each consecutive 12-month period.

f. Results of all visible emission evaluations and performance evaluations.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five years.
(9 VAC 5-50-50, 9 VAC 5-80-110, 9 VAC 5-40-4420, 9 VAC 5-40-4390, 40 CFR 60.445(a), and Condition 12 of 01/21/04 Permit)

C. Testing

1. An initial performance test shall be conducted by calculating a weighted average of the mass of solvent used per mass of coating solids applied for a one calendar month period for the modified tandem emulsion coating line to determine compliance with the emission limit contained in Condition III.A.1 according to the following procedures:

   a. Determine the weight fraction of organics and the weight fraction of solids of each coating applied by using Reference Method 24 or by the coating manufacturer's formulation data.

   b. Compute the weighted average by the following equation:

$$G = \frac{\sum_{i=1}^{n} W_{oi} M_{ci}}{\sum_{i=1}^{n} W_{si} M_{ci}}$$

(Equation III-4)

Where:

G	=	the calculated weighted average mass (lb) of VOC per mass (lb) of coating solids applied each calendar month.
M_{ci}	=	the total mass (lb) of each coating (i) applied during the calendar month as determined from facility records.
W_{oi}	=	the weight fraction of VOC applied of each coating (i) applied during a calendar month as determined by using Reference Method 24 or by the coating manufacturer's formulation data.
W_{si}	=	the weight fraction of solids applied of each coating (i) applied during a calendar month as determined by using Reference Method 24 or by the coating manufacturer's formulation data.

The test shall be performed, reported, demonstrate compliance, and the results submitted to the Director, Valley Regional Office (postmarked) within 60 days after achieving the maximum production rate at which the facility will be operated but in no event later than 180 days after modification to the tandem emulsion coating line. The test shall be conducted and reported and data reduced as set forth in 9 VAC 5-50-30, and the test methods and procedures contained in each applicable section or subpart listed in 9 VAC 5-50-410. The details of the tests are to be arranged with the Director, Valley Regional Office. One copy of the performance test result shall be submitted to EPA at the address contained in Condition III.E. The test report shall conform to the test report format enclosed with this permit.
(9 VAC 5-80-110, 9 VAC 5-50-30, 40 CFR 60.444(a), 40 CFR 60.447(a), and Condition 15 of 01/21/04 Permit)

2. Visible Emission Evaluations (VEE) in accordance with 40 CFR Part 60, Appendix A, Method 9, shall be conducted by the permittee on the following equipment: tandem emulsion coating line stack exhausts 1A/1B and 1C. Each test shall consist of ten sets of 24 consecutive observations (at 15 second intervals) to yield a six minute average. The details of the tests are to be arranged with the Director, Valley Regional Office. The evaluation shall be performed, reported, and demonstrate compliance within 60 days after achieving the maximum production rate at which the facility will be operated but in no event later than 180 days after modification to tandem emulsion coating line. One copy of the test result shall be submitted to the Director, Valley Regional Office, within 60 days after test completion and shall conform to the test report format enclosed with this permit.
(9 VAC 5-80-110, 9 VAC 5-50-30, and Condition 16 of 01/21/04 Permit)

3. The permitted facility shall be constructed so as to allow for emissions testing upon reasonable notice at any time, using appropriate methods. Test ports shall be provided when requested at the appropriate locations in accordance with the applicable performance specification (reference 40 CFR Part 60, Appendix B).
(9 VAC 5-50-30, 9 VAC 5-80-110, and Condition 18 of 01/21/04 Permit)

4. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following methods in accordance with procedures approved by the DEQ, but not limited to, as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
VOC	EPA Methods 18, 25, 25a
VOC Content	EPA Methods 24, 24a
PM/PM-10	EPA Methods 5, 17
Visible Emission	EPA Method 9

(9 VAC 5-80-110)

D. Reporting

1. Following the initial report as required in Condition III.C.1, the permittee shall submit a quarterly report to the Director, Valley Regional Office, of exceedances of the VOC emission limit specified in Condition III.A.1 for the tandem emulsion coating line. If no such exceedances occur during a particular quarter, a report stating this shall be submitted to the Director, Valley Regional Office, semi-annually. One copy of the quarterly/semi-annual report shall be submitted to the U.S. Environmental Protection Agency at the address specified in Condition III.E. After the initial report, subsequent reports shall be submitted in accordance with the schedule contained in Condition III.D.2.

   (9 VAC 5-50-50, 9 VAC 5-80-110, 40 CFR 60.447(b), and Condition 13 of 01/21/04 Permit)

2. The permittee shall submit a report to the Director, Valley Regional Office, in accordance with the following schedule:

Time Period Covered by Report	Report Due Date
January 1 – March 31	June 1
April 1 – June 30	September 1 *
July 1 – September 30	December 1
October 1 – December 31	March 1 *

*semi-annual report dates

   Each quarterly report shall contain, at a minimum, the dates included in the calendar quarter and a summary of the information requested in parts b, c, and d of Condition III.B.4.
   (9 VAC 5-80-110, 9 VAC 5-50-50 and Condition 14 of 01/21/04 Permit)

E. Notifications

The permittee shall furnish written notification to the Director, Valley Regional Office:

a. The actual date on which modification of the tandem emulsion coating line commenced within 30 days after such date.

b. The anticipated start-up date of the modified tandem emulsion coating line postmarked not more than 60 days nor less than 30 days prior to such date.

c. The actual start-up date of the modified tandem emulsion coating line within 15 days after such date.

d. The anticipated date of the VEE for the tandem emulsion coating line postmarked at least 30 days prior to such date.

Copies of the written notification referenced in a through d above are to be sent to

Associate Director
Office of Air Enforcement (3AP10)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

(9 VAC 5-80-110, 9 VAC 5-50-50, 40 CFR 60.7(a), and Condition 19 of 01/21/04 Permit)

IV. Process Equipment Requirements – Tandem Emulsion Coating Line (Unit 2)

This section becomes effective upon installation of Unit 2.

A. Limitations

1. Volatile organic compound (VOC) emissions from the operation of the tandem emulsion coating line, as calculated on a weighted monthly average, shall not exceed 0.20 pound of VOC per pound of coating solids applied.
   (9 VAC 5-80-110, 40 CFR 60.442(a)(1), and Condition 7 of 01/21/04 Permit)

2. Each coating, as delivered by each coating applicator of the tandem emulsion coating line, shall not exceed 2.9 pounds of volatile organic compounds per gallon of coating, excluding water.
   (9 VAC 5-80-110 and 9 VAC 5-40-4330 A)

3. Volatile organic compound emissions from the tandem emulsion coating line shall be controlled by the use of water-based adhesives and low solvent coatings.
   (9 VAC 5-80-110, 9 VAC 5-40-4340, and Condition 3 of 01/21/04 Permit)

4. The permittee shall take reasonable precautions to minimize volatile organic compound emissions from cleaning or purging operations. Reasonable precautions may include the following:

   a. The use of detergents, high pressure water, or other non-volatile cleaning methods;

   b. The minimization of the quantity of volatile organic compounds used to clean lines of equipment; and

   c. The adjustment of production schedules to minimize coating changes thereby reducing the need for frequent cleaning or purging of a system.

   (9 VAC 5-80-110 and 9 VAC 5-40-4330 E)

5. Volatile organic compounds shall not be intentionally spilled, discarded to sewers, stored in open containers, or handled in any other manner that would result in evaporation beyond that consistent with air pollution control practices for minimizing emissions.
   (9 VAC 5-80-110 and Condition 4 of 01/21/04 Permit)

6. Emissions from the operation of the tandem emulsion coating line shall not exceed the limits specified below:

Particulate Matter (coating operations)	123.0 lbs/day	21.8 tons/yr
PM-10 (coating operations)	123.0 lbs/day	21.8 tons/yr
Volatile Organic Compounds (coating operations)		95.9 tons/yr

Annual emissions shall be calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-110 and Condition 9 of 01/21/04 Permit)

7. Visible Emissions from each tandem emulsion coating line stack shall not exceed 5 percent opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-80-110, 9 VAC 5-50-80, 9 VAC 5-40-60, and Condition 10 of 01/21/04 Permit)

8. Authorization to install Unit 2 shall become invalid, unless an extension is granted by the DEQ, if:

   a. A program of continuous installation is not commenced before the latest of the following:

      (1) July 21, 2005;

      (2) Nine months from the date that the last permit or other authorization was issued from any other governmental agency;

      (3) Nine months from the date of the last resolution of any litigation concerning any such permit or authorization; or

   b. A program of installation is discontinued for a period of 18 months or more, or is not completed within a reasonable time, except for a DEQ approved period between phases of a phased construction project.

   (9 VAC 5-80-110 and Condition 20 of 01/21/04 Permit)

B. Monitoring and Recordkeeping

1. Each calendar month, the permittee shall determine compliance with the VOC limit in Condition IV.A.1 by calculating the weighted average of the mass of solvent used per mass of coating solids applied using the following formula:

$$G = \frac{\sum_{i=1}^{n} W_{oi} M_{ci}}{\sum_{i=1}^{n} W_{si} M_{ci}}$$

(Equation IV-1)

Where:

G = the calculated weighted average mass (lb) of VOC per mass (lb) of coating solids applied each calendar month.

M_{ci} = the total mass (lb) of each coating (i) applied during the calendar month as determined from facility records.

W_{oi} = the weight fraction of VOC applied of each coating (i) applied during a calendar month as determined by using Reference Method 24 or by the coating manufacturer's formulation data.

W_{si} = the weight fraction of solids applied of each coating (i) applied during a calendar month as determined by using Reference Method 24 or by the coating manufacturer's formulation data.

(9 VAC 5-80-110, 40 CFR 60.443(a), and Conditions 15 and 17 of 01/21/04 Permit)

2. The permittee shall determine compliance with the VOC limits in Condition IV.A.6 by calculating the VOC emissions as follows:

$$E = \sum_{i=1}^{n} M_{ci} W_{oi}$$

(Equation IV-2)

Where:

E = the VOC emissions in pounds per time period

M_{ci} = the total mass (lb) of each coating (i) applied during each time period as determined from facility records.

W_{oi} = the weight fraction of VOC applied of each coating (i) applied during each time period as determined from coating manufacturer's formulation data or alternative method approved by the Department.

Annual emissions shall be calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-110)

3. The permittee shall determine compliance with the PM and PM-10 limits in Condition IV.A.6 by calculating the PM and PM-10 emissions as follows:

$$E = F \times S$$

(Equation IV-3)

Where:

E = the PM or PM-10 emissions in pounds per time period

F = weight fraction of PM and PM-10 for each silicone coatings used

S = amount of silicone coating applied in pound per time period

Annual emissions shall be calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-110)

4. The permittee shall monitor and maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Valley Regional Office. These records shall include, but are not limited to:

   a. Certified Material Safety Data Sheets (MSDS)/VOC Data Sheets or other equivalent documentation showing VOC content, water content, and solids content for each coating used.

   b. Coating records sufficient to show compliance with the volatile organic compound content limit contained in Condition III.A.2.

   c. Daily throughput (in pounds), weighted average VOC and solids fractions, and the VOC to solids ratio of each coating used in the tandem emulsion coating line.

   d. Daily and annual emissions (in pounds) of VOC, PM, and PM-10 from the tandem emulsion coating line. Annual emissions shall be calculated monthly as the sum of each consecutive 12-month period.

e. Monthly and annual throughput and VOC content of cleaning solvents used (in pounds), calculated monthly as the sum of each consecutive 12-month period.

f. Results of all visible emission evaluations and performance evaluations.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five years.
(9 VAC 5-50-50, 9 VAC 5-80-110, 9 VAC 5-40-4420, 9 VAC 5-40-4390, 40 CFR 60.445(a), and Condition 12 of 01/21/04 Permit)

C. Testing

1. An initial performance test shall be conducted by calculating a weighted average of the mass of solvent used per mass of coating solids applied for a one calendar month period for the tandem emulsion coating line to determine compliance with the emission limit contained in Condition IV.A.1 according to the following procedures:

   a. Determine the weight fraction of organics and the weight fraction of solids of each coating applied by using Reference Method 24 or by the coating manufacturer's formulation data.

   b. Compute the weighted average by the following equation:

$$G = \frac{\sum_{i=1}^{n} W_{oi} M_{ci}}{\sum_{i=1}^{n} W_{si} M_{ci}}$$

(Equation IV-4)

Where:

G	=	the calculated weighted average mass (lb) of VOC per mass (lb) of coating solids applied each calendar month.
M_{ci}	=	the total mass (lb) of each coating (i) applied during the calendar month as determined from facility records.
W_{oi}	=	the weight fraction of VOC applied of each coating (i) applied during a calendar month as determined by using Reference Method 24 or by the coating manufacturer's formulation data.
W_{si}	=	the weight fraction of solids applied of each coating (i) applied during a calendar month as determined by using Reference Method 24 or by the coating manufacturer's formulation data.

The test shall be performed, reported, demonstrate compliance, and the results submitted to the Director, Valley Regional Office (postmarked) within 60 days after

achieving the maximum production rate at which the facility will be operated but in no event later than 180 days after start-up of the tandem emulsion coating line. The test shall be conducted and reported and data reduced as set forth in 9 VAC 5-50-30, and the test methods and procedures contained in each applicable section or subpart listed in 9 VAC 5-50-410. The details of the tests are to be arranged with the Director, Valley Regional Office. One copy of the performance test result shall be submitted to EPA at the address contained in Condition IV.E. The test report shall conform to the test report format enclosed with this permit.
(9 VAC 5-80-110, 9 VAC 5-50-30, 40 CFR 60.444(a), 40 CFR 60.447(a), and Condition 15 of 01/21/04 Permit)

2. Visible Emission Evaluations (VEE) in accordance with 40 CFR Part 60, Appendix A, Method 9, shall be conducted by the permittee on the following equipment: tandem emulsion coating line stack exhausts 2A/2B and 2C. Each test shall consist of ten sets of 24 consecutive observations (at 15 second intervals) to yield a six minute average. The details of the tests are to be arranged with the Director, Valley Regional Office. The evaluation shall be performed, reported, and demonstrate compliance within 60 days after achieving the maximum production rate at which the facility will be operated but in no event later than 180 days after start-up of the tandem emulsion coating line. One copy of the test result shall be submitted to the Director, Valley Regional Office, within 60 days after test completion and shall conform to the test report format enclosed with this permit.
(9 VAC 5-80-110, 9 VAC 5-50-30, and Condition 16 of 01/21/04 Permit)

3. The permitted facility shall be constructed so as to allow for emissions testing upon reasonable notice at any time, using appropriate methods. Test ports shall be provided when requested at the appropriate locations in accordance with the applicable performance specification (reference 40 CFR Part 60, Appendix B).
(9 VAC 5-50-30, 9 VAC 5-80-110, and Condition 18 of 01/21/04 Permit)

4. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following methods in accordance with procedures approved by the DEQ, but not limited to, as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
VOC	EPA Methods 18, 25, 25a
VOC Content	EPA Methods 24, 24a
PM/PM-10	EPA Methods 5, 17
Visible Emission	EPA Method 9

(9 VAC 5-80-110)

D. Reporting

1. Following the initial report as required in Condition IV.C.1, the permittee shall submit a quarterly report to the Director, Valley Regional Office, of exceedances of the VOC emission limit specified in Condition IV.A.1 for the tandem emulsion coating line. If no such exceedances occur during a particular quarter, a report stating this shall be submitted to the Director, Valley Regional Office, semi-annually. One copy of the quarterly/semi-annual report shall be submitted to the U.S. Environmental Protection Agency at the address specified in Condition IV.E. After the initial report, subsequent reports shall be submitted in accordance with the schedule contained in Condition IV.D.2.

   (9 VAC 5-50-50, 9 VAC 5-80-110, 40 CFR 60.447(b), and Condition 13 of 01/21/04 Permit)

2. The permittee shall submit a report to the Director, Valley Regional Office, in accordance with the following schedule:

Time Period Covered by Report	Report Due Date
January 1 – March 31	June 1
April 1 – June 30	September 1 *
July 1 – September 30	December 1
October 1 – December 31	March 1 *

*semi-annual report dates

   Each quarterly report shall contain, at a minimum, the dates included in the calendar quarter and a summary of the information requested in parts b, c, and d of Condition IV.B.4.
   (9 VAC 5-80-110, 9 VAC 5-50-50 and Condition 14 of 01/21/04 Permit)

E. Notifications

The permittee shall furnish written notification to the Director, Valley Regional Office:

a. The actual date on which installation of the tandem emulsion coating line commenced within 30 days after such date.

b. The anticipated start-up date of the tandem emulsion coating line postmarked not more than 60 days nor less than 30 days prior to such date.

c. The actual start-up date of the tandem emulsion coating line within 15 days after such date.

d. The anticipated date of the VEE for the tandem emulsion coating line postmarked at least 30 days prior to such date.

Copies of the written notification referenced in a through d above are to be sent to

Associate Director
Office of Air Enforcement (3AP10)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

(9 VAC 5-80-110, 9 VAC 5-50-50, 40 CFR 60.7(a), and Condition 19 of 01/21/04 Permit)

V. Fuel Burning Conditions

A. Limitations

1. The approved fuels for the facility are natural gas and liquefied petroleum gas (propane). A change in the fuels may require a permit to modify and operate. (9 VAC 5-80-110 and Condition 5 of 01/21/04 Permit)

2. Nitrogen oxide (as NO_2) emissions from all fuel burning equipment shall not exceed 93.2 pounds per day when burning natural gas and 193.5 pounds per day when burning propane.
(9 VAC 5-80-110 and Condition 6 of 01/21/04 Permit)

3. The tandem emulsion coating line dryers shall not emit sulfur dioxide emissions in excess of the following limit:

$$S = 2.64K$$

(Equation V-1)

Where:
S = allowable emission of sulfur dioxide expressed in lb/hr
K = actual heat input at total capacity expressed in mmBtu/hr

(9 VAC 5-80-110 and 9 VAC 5-40-280)

B. Recordkeeping

The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Valley Regional Office. These records shall include, but are not limited to:

1. The DEQ approved, pollutant-specific emission factors and the equations used to demonstrate compliance with Condition V.A.2.

2. The daily and annual throughput of natural gas (in cubic feet) and the daily and annual throughput of liquid petroleum gas (propane) (in gallons) for all fuel burning equipment.

3. Fuel purchase records including type of fuel purchased.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five years.
(9 VAC 5-80-110 and Condition 12 of 01/21/04 Permit)

C. Testing

If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
NO_x	EPA Method 7

(9 VAC 5-80-110)

VI. Facility Wide Conditions for Hazardous Air Pollutant Emissions

A. Applicability

1. The following terms and conditions are the requirements of 40 CFR Part 63 Subpart JJJJ, National Emission Standards for Hazardous Pollutants: Paper and Other Web Coating. A current copy of 40 CFR Part 63 Subpart JJJJ has been attached. As used in this section, all terms shall have the meaning as defined in 40 CFR 63.2 and 40 CFR 63.3310. The effective date of this section is December 5, 2005. Compliance with the standard may be demonstrated in units of lb per lb applied.

   (9 VAC 5-80-110, 9 VAC 5-60-100, and 40 CFR Part 63 Subpart JJJJ)

2. Unless the facility is operating under the operating scenario pursuant to Section VII of this permit, the facility shall be subject to the limitations, monitoring, recordkeeping, performance tests, reporting, and notifications of Section VI of this permit.

   (9 VAC 5-80-110, 9 VAC 5-60-100, and 40 CFR Part 63 Subpart JJJJ)

3. Contemporaneous with making a change from one operating scenario to another, the permittee shall record in a log at the permitted facility the date of the change and the compliance option in effect.

   (9 VAC 5-80-110 J and 40 CFR 70.6 (a)(9))

B. Limitations

Organic Hazardous Air Pollutant (HAP) emissions from the operation of each tandem emulsion coating line (Units 1 & 2) shall be limited for each month to the level specified as follows:

1. No more than 5 percent of the organic HAP applied; or

2. No more than 4 percent of the mass of coating materials applied; or

3. No more than 20 percent of the mass of coating solids applied.

(9 VAC 5-80-110, 9 VAC 5-60-100 and 40 CFR 63.3320(b)(1), (2) & (3))

C. Monitoring and Recordkeeping

1. **Compliance Determination –** To demonstrate compliance with the emission standards contained in Condition VI.A when using “as-purchased” compliant coating

materials, the permittee shall demonstrate that each coating material used does not exceed 0.2 kg organic HAP per kg coating solids as purchased.
(9 VAC 5-80-110, 9 VAC 5-60-100 and 40 CFR 63.3370(b)(1))

2. **Compliance Determination –** To demonstrate compliance with the emission standards contained in Condition VI.A when using "as-applied" compliant coating materials, the permittee shall demonstrate using one of the following options:

   a. Each coating material used does not exceed 0.2 kg organic HAP per kg coating solids "as-applied". When using this option, the permittee shall calculate the "as-applied" coating solids content which are reduced, thinned, or diluted prior to application and calculate the "as-applied" organic HAP to coating solids ratio using the following equations:

   (1)

$$C_{asi} = \frac{\left(C_{si} M_i + \sum_{j=1}^{q} C_{sij} M_{ij} \right)}{M_i + \sum_{j=1}^{q} M_{ij}}$$

(Equation VI-1)

Where:

C_{asi}	=	Monthly average, as-applied, coating solids content of coating material, i, expressed as a mass fraction, kg/kg.
C_{si}	=	Coating solids content of coating material, i, expressed as a mass fraction, kg/kg.
M_i	=	Mass of as-purchased coating material, i, applied in a month, kg.
q	=	Number of different materials added to the coating material.
C_{sij}	=	Coating solids content of material, j, added to as-purchased coating material, i, expressed as a mass fraction, kg/kg.
M_{ij}	=	Mass of material, j, added to as-purchased coating material, i, in a month, kg.
M_i	=	Mass of as-purchased coating material, i, applied in a month, kg.

(2)

$$H_{si} = \frac{C_{ahi}}{C_{asi}}$$

(Equation VI-2)

Where:

H_{si} = As-applied, organic HAP to coating solids ratio of coating material, i.

C_{ahi} = Monthly average, as-applied, organic HAP content of coating material, i, expressed as a mass fraction, kg/kg.

C_{asi} = Monthly average, as-applied, coating solids content of coating material, i, expressed as a mass fraction, kg/kg.

b. Monthly average of all coating materials used does not exceed 0.2 kg organic HAP per kg coating solids "as-applied" on a monthly average basis. When using this option, the permittee shall calculate the monthly average, "as-applied", organic HAP to coating solids ratio using the following equation:

$$H_S = \frac{\sum_{i=1}^{p} C_{hi} M_i + \sum_{j=1}^{q} C_{hij} M_{ij} - M_{vret}}{\sum_{i=1}^{p} C_{Si} M_i + \sum_{j=1}^{q} C_{Sij} M_{ij}}$$

(Equation VI-3)

Where:

H_S = Monthly average, as-applied, organic HAP to coating solids ratio, kg organic HAP/kg coating solids applied.

p = Number of different coating materials applied in a month.

C_{hi} = Organic HAP content of coating material, i, as-purchased, expressed as a mass fraction, kg/kg.

M_i = Mass of as-purchased coating material, i, applied in a month, kg.

q = Number of different materials added to the coating material.

C_{hij} = Organic HAP content of material, j, added to as-purchased coating material, i, expressed as a mass fraction, kg/kg.

M_{ij} = Mass of material, j, added to as-purchased coating material, i, in a month, kg.

M_{vret} = Mass of volatile matter retained in the coated web after curing or drying, or otherwise not emitted to the atmosphere, kg. The value of this term will be zero in all cases except where the permittee chooses to take into account the volatile matter retained in the coated web or otherwise not emitted to the atmosphere.

C_{si} = Coating solids content of coating material, i, expressed as a mass fraction, kg/kg.

C_{sij} = Coating solids content of coating material, j, added to as-purchased coating material, i, expressed as a mass fraction, kg/kg.

(9 VAC 5-80-110, 9 VAC 5-60-100 and 40 CFR 63.3370(c))

3. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Valley Regional Office. These records shall include, but are not limited to:

   a. Organic HAP content data for the purpose of demonstrating compliance in accordance with the requirements of Condition VI.D.1.

   b. Volatile matter and coating solids content data for the purpose of demonstrating compliance in accordance with the requirements of VI.D.3.

   c. On a monthly basis, material usage, organic HAP usage, volatile matter usage, and coating solids usage and compliance demonstrations using these data in accordance with the requirements of Conditions VI.C.1.

   d. Compliance option operating log in accordance with Condition VI.A.3.

   e. All performance test results.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five years.
(9 VAC 5-80-110, 9 VAC 5-60-100 and 40 CFR 63.3410(a)(1)(iii), (iv), and (vi))

D. Performance Tests

Performance tests for Units 1 and 2 shall be conducted by the permittee within 180 days of the specified compliance date for this section. Results of the tests are to be submitted to the Director, Valley Regional Office, within 60 days of test completion. The results of the performance tests shall be submitted as part of the notification of compliance status required in Condition VI.F.2 of this permit.

1. **Performance Tests for "As-Purchased" Organic HAP Mass Fraction –** Determine the organic HAP mass fraction of each coating material "as-purchased" by one of the following procedures:

   a. **Method 311** – The permittee may test the coating material in accordance with EPA Method 311 of 40 CFR Part 63, Appendix A. The Method 311 determination may be performed by the manufacturer of the coating material and the results provided to the permittee. The organic HAP content must be calculated according to the criteria and procedures as follows:

      (1) Include each organic HAP determined to be present at greater than or equal to 0.1 mass percent for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and greater than or equal to 1.0 mass percent for other organic HAP compounds.

      (2) Express the mass fraction of each organic HAP you include according to paragraph (1) above as a value truncated to four places after the decimal point (for example, 0.3791).

      (3) Calculate the total mass fraction of organic HAP in the tested material by summing the counted individual organic HAP mass fractions and truncating the result to the three places after the decimal point (for example, 0.763).

   b. **Method 24** – For coatings, the permittee may determine the volatile organic content as mass fraction of nonaqueous volatile matter and use it as a substitute for organic HAP using EPA Method 24 of 40 CFR Part 60, Appendix A. The Method 24 determination may be performed by the manufacturer of the coating and the results provided to the permittee.

   c. **Formulation Data** – The permittee may use formulation data to determine the organic HAP mass fraction of a coating material. Formulation data may be provided to the permittee by the manufacturer of the material. In the event of an inconsistency between Method 311 (Appendix A of 40 CFR Part 63) test data and a facility's formulation data, and the Method 311 test value is higher, the Method 311 data will govern. Formulation data may be used provided that the information represents all organic HAP present at a level equal to or greater than 0.1 percent for OSHA-defined carcinogens as specified in 29 CFR 1910.1200 (d)(4) and equal to or greater than 1.0 percent for other organic HAP compounds in any raw material used.

   If the organic HAP content values are not determined using Method 311, Method 24, or Formulation Data, the permittee must submit an alternative test method for

determining their values for approval by the Director, Valley Regional Office and the U.S. EPA in accordance with 40 CFR 63.7(f).
(9 VAC 5-80-110, 9 VAC 5-60-100 and 40 CFR 63.3360 (c)(1), (2), and (3))

2. **Performance Tests for "As-applied" Organic HAP Mass Fraction –** The permittee shall determine the organic HAP or volatile matter and coating solids content of coating materials according to the following procedures:

   a. If the "as-purchased" coating material is applied to the web without any solvent or other material added, then the "as-applied" organic HAP mass fraction is equal to the "as-purchased" organic HAP mass fraction. Otherwise, the "as-applied" organic HAP mass fraction must be calculated as stated in paragraph b. below.

   b. Calculate the organic HAP mass fraction of each coating material "as-applied" using the following equation:

$$C_{ahi} = \frac{\left(C_{hi} M_i + \sum_{j=1}^{q} C_{hij} M_{ij} \right)}{M_i + \sum_{j=1}^{q} M_{ij}}$$

(Equation VI-4)

Where:

C_{ahi}	=	Monthly average, as-applied, organic HAP content of coating material, i, expressed as a mass fraction, kg/kg.
C_{hi}	=	Organic HAP content of coating material, i, as-purchased, expressed as a mass fraction, kg/kg.
M_i	=	Mass of as-purchased coating material, i, applied in a month, kg.
q	=	Number of different materials added to the coating material.
C_{hij}	=	Organic HAP content of material, j, added to as-purchased coating material, i, expressed as a mass fraction, kg/kg.
M_{ij}	=	Mass of material, j, added to as-purchased coating material, i, in a month, kg.

(9 VAC 5-80-110, 9 VAC 5-60-100 and 40 CFR 63.3360(c)(4))

3. **Performance Tests for Volatile Organic and Coating Solids Content** – The permittee may choose to use the volatile organic content as a surrogate for the organic HAP content of coatings. If this option is chosen, the permittee shall determine the

"as-purchased" volatile organic content and coating solids content of each coating material applied using one of the following procedures:

a. **Method 24** - The permittee may determine the volatile organic and coating solids mass fraction of each coating applied using EPA Method 24 (40 CFR Part 60, Appendix A). The Method 24 determination may be performed by the manufacturer of the material and the results provided to the permittee. If these values cannot be determined using Method 24, the permittee must submit an alternative technique for determining their values for approval by the Director, Valley Regional Office and the U.S. EPA.

b. **Formulation Data** – The permittee may determine the volatile organic content and coating solids content of a coating material based on formulation data and may rely on volatile organic content data provided by the manufacturer of the material. If the event of any inconsistency between the formulation data and the results of Method 24 of 40 CFR Part 60, Appendix A, and the Method 24 results are higher, the results of Method 24 will govern.

(9 VAC 5-80-110, 9 VAC 5-60-100 and 40 CFR 63.3360(d)(1) and (2))

4. **Performance Tests for Volatile Organic and Coating Solids Content –** The permittee shall determine the "as-applied" volatile organic content and the "as-applied" coating solids content of coating materials according to the following procedures:

a. If the "as-purchased" coating material is applied to the web without any solvent or other material added, then the "as-applied" volatile organic content is equal to the "as-purchased" volatile content and the "as-applied" coating solids content is equal to the "as-purchased" coating solids content. Otherwise, the "as-applied" volatile organic content must be calculated as stated in paragraph b below and the "as-applied" coating solids content must be calculated as stated in paragraph c below.

b. Calculate the "as-applied" volatile organic content of each coating material using the following equation:

$$C_{avi} = \frac{\left(C_{vi} M_i + \sum_{j=1}^{q} C_{vij} M_{ij} \right)}{M_i + \sum_{j=1}^{q} M_{ij}}$$

(Equation VI-5)

Where:

C_{avi} = Monthly average, as-applied, volatile organic content of coating material, i, expressed as a mass fraction, kg/kg.

C_{vi} = Volatile organic content of coating material, i, expressed as a mass fraction, kg/kg.

M_i = Mass of as-purchased coating material, i, applied in a month, kg.

q = Number of different materials added to the coating material.

C_{vij} = Volatile organic content of material, j, added to as-purchased coating material, i, expressed as a mass fraction, kg/kg.

M_{ij} = Mass of material, j, added to as-purchased coating material, i, in a month, kg.

c. Calculate the "as-applied" coating solids content of each coating material using the following equation:

$$C_{asi} = \frac{\left(C_{si} M_i + \sum_{j=1}^{q} C_{sij} M_{ij} \right)}{M_i + \sum_{j=1}^{q} M_{ij}}$$

(Equation VI-6)

Where:

C_{asi} = Monthly average, as-applied, coating solids content of coating material, i, expressed as a mass fraction, kg/kg.

C_{si} = Coating solids content of coating material, i, expressed as a mass fraction, kg/kg.

M_i = Mass of as-purchased coating material, i, applied in a month, kg.

q = Number of different materials added to the coating material.

C_{sij} = Coating solids content of material, j, added to as-purchased coating material, i, expressed as a mass fraction, kg/kg.

M_{ij} = Mass of material, j, added to as-purchased coating material, i, in a month, kg.

M_i = Mass of as-purchased coating material, i, applied in a month, kg.

(9 VAC 5-80-110, 9 VAC 5-60-100 and 40 CFR 63.3360(d)(3))

5. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method
Hazardous Air Pollutants (HAPs)	40 CFR Part 63, Appendix A, EPA Method 311
Solids Content & Density of Coatings	40 CFR Part 60, Appendix A, EPA Method 24

(9 VAC 5-80-110)

E. Reporting

1. The permittee shall submit a semiannual compliance report to the Director, Valley Regional Office, of exceedances of the emission limitations specified in Condition VI.E for each affected source. Each report shall contain, at minimum, the following information:

   a. The company name and address.

   b. A statement by a responsible official with the official's name, title, and signature certifying the accuracy of the content of the report.

   c. The date of the report and the beginning and ending dates of the reporting period.

   d. If there are no deviations from any of the emission limitations contained in Condition VI.A, a statement that there were no deviations from the emission limitations during the reporting period.

   e. For each deviation from an emission limitation specified in Condition VI.A, the report shall must also contain the following information:

      (1) The total operating time of each affected source during the reporting period,

      (2) Information on the number, duration, and cause of deviations (including unknown cause), if applicable, and the corrective action taken.

   (9 VAC 5-80-110, 9 VAC 5-60-100 and 40 CFR 63.3400(c))

2. The first compliance report shall cover the period beginning on December 5, 2005 and ending on June 30, 2006. The permittee shall submit the initial report no later than September 1, 2006. Each subsequent report shall be in accordance with the following schedule:

Time Period Covered by Report	Report Due Date
January 1 – June 30	September 1
July 1 – December 31	March 1

(9 VAC 5-80-110, 9 VAC 5-60-100 and 40 CFR 63.3400(c)(v))

F. Notifications

The permittee shall furnish written notification to the Director, Valley Regional Office:

1. The anticipated date of the performance tests postmarked at least 60 days prior to such date.

2. A notification of compliance status within 60 days after completion of performance tests. The notification shall include the following:

   a. Methods used to determine compliance;

   b. The results of any performance tests and/or monitoring procedures or other methods that were conducted;

   c. The methods that will be used for determining continuing compliance including a description of monitoring and reporting requirements and test methods;

   d. The type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times and in accordance with the test methods specified in the relevant standard;

   e. An analysis demonstrating whether the affected source is a major source or an area source; and

   f. A statement by the owner as to whether the source has complied with the relevant standard or other requirements.

(9 VAC 5-80-110, 9 VAC 5-60-100, 40 CFR 63.7(b), 40 CFR 63.9(h))

VII. Alternative Facility Wide Conditions for HAP Emissions

A. Applicability

1. The following terms and conditions are the requirements of 40 CFR Part 63 Subpart JJJJ, National Emission Standards for Hazardous Pollutants: Paper and Other Web Coating. A current copy of 40 CFR Part 63 Subpart JJJJ has been attached. As used in this section, all terms shall have the meaning as defined in 40 CFR 63.2 and 40 CFR 63.3310. The effective date of this section is December 5, 2005. Compliance with the standard may be demonstrated in units of lb per lb applied.

   (9 VAC 5-80-110, 9 VAC 5-60-100, and 40 CFR Part 63 Subpart JJJJ)

2. Unless the facility is operating under the operating scenario pursuant to Section VI of this permit, the facility shall be subject to the limitations, monitoring, recordkeeping, performance tests, reporting, and notifications of Section VII of this permit.

   (9 VAC 5-80-110, 9 VAC 5-60-100, and 40 CFR Part 63 Subpart JJJJ)

3. Contemporaneous with making a change from one operating scenario to another, the permittee shall record in a log at the permitted facility the date of the change and the compliance option in effect.

   (9 VAC 5-80-110 J and 40 CFR 70.6 (a)(9))

B. Limitations

Organic Hazardous Air Pollutant (HAP) emissions from the operation of each tandem emulsion coating line (Units 1 & 2) shall be limited for each month to the level specified as follows:

1. No more than 5 percent of the organic HAP applied; or

2. No more than 4 percent of the mass of coating materials applied; or

3. No more than 20 percent of the mass of coating solids applied.

(9 VAC 5-80-110, 9 VAC 5-60-100 and 40 CFR 63.3320(b)(1), (2) & (3))

C. Monitoring and Recordkeeping

1. **Compliance Determination –** To demonstrate compliance with the emission standards contained in Condition VII.A when using “as-purchased” compliant coating materials, the permittee shall demonstrate that each coating material used does not

exceed 0.04 kg organic HAP per kg coating material as purchased.
(9 VAC 5-80-110, 9 VAC 5-60-100 and 40 CFR 63.3370(b)(1))

2. **Compliance Determination –** To demonstrate compliance with the emission standards contained in Condition VII.A when using "as-applied" compliant coating materials, the permittee shall demonstrate by one of the following options:

   a. Each coating material used does not exceed 0.04 kg organic HAP per kg coating material "as-applied". When using this option, the permittee shall calculate the "as-applied" organic HAP content of the "as-purchased" coating material which are reduced, thinned, or diluted prior to application using one of the following equations:

      (1)

$$C_{ahi} = \frac{\left(C_{hi} M_i + \sum_{j=1}^{q} C_{hij} M_{ij} \right)}{M_i + \sum_{j=1}^{q} M_{ij}}$$

(Equation VII-1)

Where:

C_{ahi}	=	Monthly average, as-applied, organic HAP content of coating material, i, expressed as a mass fraction, kg/kg.
C_{hi}	=	Organic HAP content of coating material, i, as-purchased, expressed as a mass fraction, kg/kg.
M_i	=	Mass of as-purchased coating material, i, applied in a month, kg.
q	=	Number of different materials added to the coating material.
C_{hij}	=	Organic HAP content of material, j, added to as-purchased coating material, i, expressed as a mass fraction, kg/kg.
M_{ij}	=	Mass of material, j, added to as-purchased coating material, i, in a month, kg.

(2)

$$C_{avi} = \frac{\left(C_{vi}M_i + \sum_{j=1}^{q} C_{vij}M_{ij} \right)}{M_i + \sum_{j=1}^{q} M_{ij}}$$

(Equation VII-2)

Where:

C_{avi} = Monthly average, as-applied, volatile organic content of coating material, i, expressed as a mass fraction, kg/kg.

C_{vi} = Volatile organic content of coating material, i, expressed as a mass fraction, kg/kg.

M_i = Mass of as-purchased coating material, i, applied in a month, kg.

q = Number of different materials added to the coating material.

C_{vij} = Volatile organic content of material, j, added to as-purchased coating material, i, expressed as a mass fraction, kg/kg.

M_{ij} = Mass of material, j, added to as-purchased coating material, i, in a month, kg.

b. Monthly average of all coating materials used does not exceed 0.04 kg organic HAP per kg coating material "as-applied" on a monthly average basis. When using this option, the permittee shall calculate the monthly average "as-applied" organic HAP content of all coating materials applied using the following equation:

$$H_L = \frac{\sum_{i=1}^{p} C_{hi}M_i + \sum_{j=1}^{q} C_{hij}M_{ij} - M_{vret}}{\sum_{i=1}^{p} M_i + \sum_{j=1}^{q} M_{ij}}$$

(Equation VII-3)

Where:

H_L = Monthly average, as-applied, organic HAP content of all coating materials applied, expressed as kg organic HAP per kg of coating material applied, kg/kg.

p = Number of different coating materials applied in a month.

C_{hi} = Organic HAP content of coating material, i, as-purchased, expressed as a mass fraction, kg/kg.

M_i = Mass of as-purchased coating material, i, applied in a month, kg.

q = Number of different materials added to the coating material.

C_{hij} = Organic HAP content of material, j, added to as-purchased coating material, i, expressed as a mass fraction, kg/kg.

M_{ij} = Mass of material, j, added to as-purchased coating material, i, in a month, kg.

M_{vret} = Mass of volatile matter retained in the coated web after curing or drying, or otherwise not emitted to the atmosphere, kg. The value of this term will be zero in all cases except where the permittee chooses to take into account the volatile matter retained in the coated web or otherwise not emitted to the atmosphere.

3. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Valley Regional Office. These records shall include, but are not limited to:

   a. Organic HAP content data for the purpose of demonstrating compliance in accordance with the requirements of Condition VII.D.1.

   b. Volatile matter and coating solids content data for the purpose of demonstrating compliance in accordance with the requirements of VII.D.3.

   c. On a monthly basis, material usage, organic HAP usage, volatile matter usage, and coating solids usage and compliance demonstrations using these data in accordance with the requirements of Conditions VII.C.1.

   d. Compliance option operating log in accordance with Condition VII.A.3.

   e. All performance test results.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five years.
(9 VAC 5-80-110, 9 VAC 5-60-100 and 40 CFR 63.3410(a)(1)(iii), (iv), and (vi))

D. Performance Tests

Performance tests for Units 1 and 2 shall be conducted by the permittee within 180 days of the specified compliance date for this section. Results of the tests are to be submitted to the Director, Valley Regional Office, within 60 days of test completion. The results of

the performance tests shall be submitted as part of the notification of compliance status required in Condition VII.E.2 of this permit.

1. **Performance Tests for "As-Purchased" Organic HAP Mass Fraction –** Determine the organic HAP mass fraction of each coating material "as-purchased" by one of the following procedures:

    a. **Method 311** – The permittee may test the coating material in accordance with EPA Method 311 of 40 CFR Part 63, Appendix A. The Method 311 determination may be performed by the manufacturer of the coating material and the results provided to the permittee. The organic HAP content must be calculated according to the criteria and procedures as follows:

        (1) Include each organic HAP determined to be present at greater than or equal to 0.1 mass percent for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and greater than or equal to 1.0 mass percent for other organic HAP compounds.

        (2) Express the mass fraction of each organic HAP you include according to paragraph (1) above as a value truncated to four places after the decimal point (for example, 0.3791).

        (3) Calculate the total mass fraction of organic HAP in the tested material by summing the counted individual organic HAP mass fractions and truncating the result to the three places after the decimal point (for example, 0.763).

    b. **Method 24** – For coatings, the permittee may determine the volatile organic content as mass fraction of nonaqueous volatile matter and use it as a substitute for organic HAP using EPA Method 24 of 40 CFR Part 60, Appendix A. The Method 24 determination may be performed by the manufacturer of the coating and the results provided to the permittee.

    c. **Formulation Data** – The permittee may use formulation data to determine the organic HAP mass fraction of a coating material. Formulation data may be provided to the permittee by the manufacturer of the material. In the event of an inconsistency between Method 311 (Appendix A of 40 CFR Part 63) test data and a facility's formulation data, and the Method 311 test value is higher, the Method 311 data will govern. Formulation data may be used provided that the information represents all organic HAP present at a level equal to or greater than 0.1 percent for OSHA-defined carcinogens as specified in 29 CFR 1910.1200 (d)(4) and equal to or greater than 1.0 percent for other organic HAP compounds in any raw material used.

If the organic HAP content values are not determined using Method 311, Method 24, or Formulation Data, the permittee must submit an alternative test method for determining their values for approval by the Director, Valley Regional Office and the U.S. EPA in accordance with 40 CFR 63.7(f).
(9 VAC 5-80-110, 9 VAC 5-60-100 and 40 CFR 63.3360 (c)(1), (2), and (3))

2. **Performance Tests for "As-applied" Organic HAP Mass Fraction –** The permittee shall determine the organic HAP or volatile matter and coating solids content of coating materials according to the following procedures:

   a. If the "as-purchased" coating material is applied to the web without any solvent or other material added, then the "as-applied" organic HAP mass fraction is equal to the "as-purchased" organic HAP mass fraction. Otherwise, the "as-applied" organic HAP mass fraction must be calculated as stated in paragraph b. below.

   b. Calculate the organic HAP mass fraction of each coating material "as-applied" using the following equation:

$$C_{ahi} = \frac{\left(C_{hi} M_i + \sum_{j=1}^{q} C_{hij} M_{ij} \right)}{M_i + \sum_{j=1}^{q} M_{ij}}$$

(Equation VII-4)

Where:

C_{ahi}	=	Monthly average, as-applied, organic HAP content of coating material, i, expressed as a mass fraction, kg/kg.
C_{hi}	=	Organic HAP content of coating material, i, as-purchased, expressed as a mass fraction, kg/kg.
M_i	=	Mass of as-purchased coating material, i, applied in a month, kg.
q	=	Number of different materials added to the coating material.
C_{hij}	=	Organic HAP content of material, j, added to as-purchased coating material, i, expressed as a mass fraction, kg/kg.
M_{ij}	=	Mass of material, j, added to as-purchased coating material, i, in a month, kg.

(9 VAC 5-80-110, 9 VAC 5-60-100 and 40 CFR 63.3360(c)(4))

3. **Performance Tests for Volatile Organic and Coating Solids Content** – The permittee may choose to use the volatile organic content as a surrogate for the organic

HAP content of coatings. If this option is chosen, the permittee shall determine the "as-purchased" volatile organic content and coating solids content of each coating material applied using one of the following procedures:

a. **Method 24** - The permittee may determine the volatile organic and coating solids mass fraction of each coating applied using EPA Method 24 (40 CFR Part 60, Appendix A). The Method 24 determination may be performed by the manufacturer of the material and the results provided to the permittee. If these values cannot be determined using Method 24, the permittee must submit an alternative technique for determining their values for approval by the Director, Valley Regional Office and the U.S. EPA.

b. **Formulation Data** – The permittee may determine the volatile organic content and coating solids content of a coating material based on formulation data and may rely on volatile organic content data provided by the manufacturer of the material. If the event of any inconsistency between the formulation data and the results of Method 24 of 40 CFR Part 60, Appendix A, and the Method 24 results are higher, the results of Method 24 will govern.

(9 VAC 5-80-110, 9 VAC 5-60-100 and 40 CFR 63.3360(d)(1) and (2))

4. **Performance Tests for Volatile Organic and Coating Solids Content –** The permittee shall determine the "as-applied" volatile organic content and the "as-applied" coating solids content of coating materials according to the following procedures:

a. If the "as-purchased" coating material is applied to the web without any solvent or other material added, then the "as-applied" volatile organic content is equal to the "as-purchased" volatile content and the "as-applied" coating solids content is equal to the "as-purchased" coating solids content. Otherwise, the "as-applied" volatile organic content must be calculated as stated in paragraph b below and the "as-applied" coating solids content must be calculated as stated in paragraph c below.

b. Calculate the "as-applied" volatile organic content of each coating material using the following equation:

$$C_{avi} = \frac{\left(C_{vi} M_i + \sum_{j=1}^{q} C_{vij} M_{ij} \right)}{M_i + \sum_{j=1}^{q} M_{ij}}$$

(Equation VII-5)

Where:

C_{avi} = Monthly average, as-applied, volatile organic content of coating material, i, expressed as a mass fraction, kg/kg.

C_{vi} = Volatile organic content of coating material, i, expressed as a mass fraction, kg/kg.

M_i = Mass of as-purchased coating material, i, applied in a month, kg.

q = Number of different materials added to the coating material.

C_{vij} = Volatile organic content of material, j, added to as-purchased coating material, i, expressed as a mass fraction, kg/kg.

M_{ij} = Mass of material, j, added to as-purchased coating material, i, in a month, kg.

c. Calculate the "as-applied" coating solids content of each coating material using the following equation:

$$C_{asi} = \frac{\left(C_{si}M_i + \sum_{j=1}^{q} C_{sij}M_{ij} \right)}{M_i + \sum_{j=1}^{q} M_{ij}}$$

(Equation VII-6)

Where:

C_{asi} = Monthly average, as-applied, coating solids content of coating material, i, expressed as a mass fraction, kg/kg.

C_{si} = Coating solids content of coating material, i, expressed as a mass fraction, kg/kg.

M_i = Mass of as-purchased coating material, i, applied in a month, kg.

q = Number of different materials added to the coating material.

C_{sij} = Coating solids content of material, j, added to as-purchased coating material, i, expressed as a mass fraction, kg/kg.

M_{ij} = Mass of material, j, added to as-purchased coating material, i, in a month, kg.

M_i = Mass of as-purchased coating material, i, applied in a month, kg.

(9 VAC 5-80-110, 9 VAC 5-60-100 and 40 CFR 63.3360(d)(3))

5. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method
Hazardous Air Pollutants (HAPs)	40 CFR Part 63, Appendix A, EPA Method 311
Solids Content & Density of Coatings	40 CFR Part 60, Appendix A, EPA Method 24

(9 VAC 5-80-110)

E. Reporting

1. The permittee shall submit a semiannual compliance report to the Director, Valley Regional Office, of exceedances of the emission limitations specified in Condition VI.E for each affected source. Each report shall contain, at minimum, the following information:

   a. The company name and address.

   b. A statement by a responsible official with the official's name, title, and signature certifying the accuracy of the content of the report.

   c. The date of the report and the beginning and ending dates of the reporting period.

   d. If there are no deviations from any of the emission limitations contained in Condition VI.A, a statement that there were no deviations from the emission limitations during the reporting period.

   e. For each deviation from an emission limitation specified in Condition VI.A, the report shall also contain the following information:

      (1) The total operating time of each affected source during the reporting period,

      (2) Information on the number, duration, and cause of deviations (including unknown cause), if applicable, and the corrective action taken.

   (9 VAC 5-80-110, 9 VAC 5-60-100 and 40 CFR 63.3400(c))

2. The first compliance report shall cover the period beginning on December 5, 2005 and ending on June 30, 2006. The permittee shall submit the initial report no later than September 1, 2006. Each subsequent report shall be in accordance with the following schedule:

Time Period Covered by Report	Report Due Date
January 1 – June 30	September 1
July 1 – December 31	March 1

(9 VAC 5-80-110, 9 VAC 5-60-100 and 40 CFR 63.3400(c)(v))

F. Notifications

The permittee shall furnish written notification to the Director, Valley Regional Office:

1. The anticipated date of the performance tests postmarked at least 60 days prior to such date.

2. A notification of compliance status within 60 days after completion of performance tests. The notification shall include the following:

   a. Methods used to determine compliance;

   b. The results of any performance tests and/or monitoring procedures or other methods that were conducted;

   c. The methods that will be used for determining continuing compliance including a description of monitoring and reporting requirements and test methods;

   d. The type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times and in accordance with the test methods specified in the relevant standard;

   e. An analysis demonstrating whether the affected source is a major source or an area source; and

   f. A statement by the owner as to whether the source has complied with the relevant standard or other requirements.

(9 VAC 5-80-110, 9 VAC 5-60-100, 40 CFR 63.7(b), 40 CFR 63.9(h))

VIII. Insignificant Emission Units

The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
1A/1B, 1C 2A/2B, 2C	Cleaning/Maintenance Activities	9 VAC 5-80-720 B	VOC, HAPs	
3A	Humidification Boiler & Boiler Water Chemicals	9 VAC 5-80-720 C	VOC, HAPs, PM/PM-10, NO_x, CO, SO_x	1,650,000 BTU/hr
3B	Hot Water Heaters & Boiler Water Chemicals	9 VAC 5-80-720 C	VOC, HAPs, PM/PM-10, NO_x, CO, SO_x	250,000 BTU/hr
3C, 3D	Office Heating Boiler & Boiler Water Chemicals	9 VAC 5-80-720 C	VOC, HAPs, PM/PM-10, NO_x, CO, SO_x	650,000 BTU/hr
3E – 3J	Space Unit Heaters	9 VAC 5-80-720 C	VOC, HAPs, PM/PM-10, NO_x, CO, SO_x	1,200,000 BUT/hr
3K – 3O	Dock Door Heaters	9 VAC 5-80-720 C	VOC, HAPs, PM/PM-10, NO_x, CO, SO_x	650,000 BTU/hr
3P	Maintenance Heater	9 VAC 5-80-720 C	VOC, HAPs, PM/PM-10, NO_x, CO, SO_x	60,000 BTU/hr
3Q	Tank Room Heater	9 VAC 5-80-720 C	VOC, HAPs, PM/PM-10, NO_x, CO, SO_x	75,000 BTU/hr
3R	Cleaver-Brooks Steam Generating Boiler & Boiler Water Chemicals	9 VAC 5-80-720 C	VOC, HAPs, PM/PM-10, NO_x, CO, SO_x	1,045,000 BTU/hr
3S	Plant Area Heater	9 VAC 5-80-720 C	VOC, HAPs, PM/PM-10, NO_x, CO, SO_x	60, 000 BTU/hr
4-9, 16-43	Fixed Roof Internal Storage Tanks for Water-based Adhesives/Primers	9 VAC 5-80-720 B	VOC, HAPs	8,325 Gallons
10-15	Fixed Roof Internal Storage Tanks for Water-based Adhesives/Primers	9 VAC 5-80-720 B	VOC, HAPs	2,646 Gallons

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
44	Safety Kleen Parts Washer or Equivalent (solvent or aqueous based	9 VAC 5-80-720 B	VOC, HAPs	30 Gallon Unit
45	Slitters / Rewinders / Trim Conveying / Coaters Web Cleaning Dust Collection Units / Silicone Mist Vacuum Units / Core Cutters	9 VAC 5-80-720 B	VOC, PM/PM-10	-
46	Lime Make-up Tanks for the Batch Wastewater Pretreatment System	9 VAC 5-80-720 B	PM/PM-10	-
47	Diatomaceous Earth (or equivalent) Make-up Tanks for the Batch Wastewater Pretreatment System	9 VAC 5-80-720 B	PM/PM-10	-
48	Wastewater Pretreatment System Chemicals (e.g. polymers, alum, ferrous sulfate, ferric chloride)	9 VAC 5-80-720 B	VOC, HAPs, PM/PM-10	-
49	Shrink Wrap Heat Guns / System	9 VAC 5-80-720 B	VOC	-

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

IX. Permit Shield & Inapplicable Requirements

Compliance with the provisions of this permit shall be deemed to be in compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

Citation	Title of Citation	Description of Applicability
40 CFR 60, Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	Not applicable for any of the storage tanks (Units 4 through 43); each unit is below the applicability capacity of less than 75 m3 (19,812.9 gallons).

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law.
(9 VAC 5-80-140)

X. General Conditions

A. Federal Enforceability

All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.
(9 VAC 5-80-110 N)

B. Permit Expiration

This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete application for renewal to the Department consistent with the requirements of 9 VAC 5-80-80, the right of the facility to operate shall be terminated upon permit expiration.

1. The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.

2. If an applicant submits a timely and complete application for an initial permit or renewal under this section, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9 VAC 5 Chapter 80, until the Board takes final action on the application under 9 VAC 5-80-150.

3. No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9 VAC 5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9 VAC 5 Chapter 80.

4. If an applicant submits a timely and complete application under section 9 VAC 5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9 VAC 5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.

5. The protection under subsections F 1 and F 5 (ii) of section 9 VAC 5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant to section 9 VAC 5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.

(9 VAC 5-80-80 B, C and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)

C. Recordkeeping and Reporting

1. All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:

   a. The date, place as defined in the permit, and time of sampling or measurements.

   b. The date(s) analyses were performed.

   c. The company or entity that performed the analyses.

   d. The analytical techniques or methods used.

   e. The results of such analyses.

   f. The operating conditions existing at the time of sampling or measurement.

   (9 VAC 5-80-110 F)

2. Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.
   (9 VAC 5-80-110 F)

3. The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than **March 1** and **September 1** of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

   a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31.

   b. All deviations from permit requirements. For purposes of this permit, deviations include, but are not limited to:

      (1) Exceedance of emissions limitations or operational restrictions;

      (2) Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or compliance assurance monitoring which indicates an exceedance of emission limitations or operational restrictions; or,

(3) Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.

c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semi-annual reporting period."

(9 VAC 5-80-110 F)

D. Annual Compliance Certification

Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than **March 1** each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

1. The time period included in the certification. The time period to be addressed is January 1 to December 31.

2. The identification of each term or condition of the permit that is the basis of the certification.

3. The compliance status.

4. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance.

5. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period.

6. Such other facts as the permit may require to determine the compliance status of the source.

One copy of the annual compliance certification shall be sent to EPA at the following address:

Clean Air Act Title V Compliance Certification (3AP00)
U. S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029.

(9 VAC 5-80-110 K.5)

E. Permit Deviation Reporting

The permittee shall notify the Director, VRO Regional Office, within four daytime business hours after discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to General Condition IX.C.3 of this permit.
(9 VAC 5-80-110 F.2 and 9 VAC 5-80-250)

F. Failure/Malfunction Reporting

In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall, as soon as practicable but no later than four daytime business hours, notify the Director, Valley Regional Office, by facsimile transmission, telephone or telegraph of such failure or malfunction and shall within 14 days of discovery provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. Owners subject to the requirements of 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9 VAC 5-40-40 and 9 VAC 5-50-40. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Director, Valley Regional Office.
(9 VAC 5-20-180 C)

G. Severability

The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.
(9 VAC 5-80-110 G.1)

H. Duty to Comply

The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.
(9 VAC 5-80-110 G.2)

I. Need to Halt or Reduce Activity not a Defense

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
(9 VAC 5-80-110 G.3)

J. Permit Action for Cause

1. This permit may be modified, revoked, reopened, and reissued, or terminated for cause as specified in 9 VAC 5-80-110 L, 9 VAC 5-80-240 and 9 VAC 5-80-260. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
   (9 VAC 5-80-110 G & L, 9 VAC 5-80-240 and 9 VAC 5-80-260)

2. Such changes that may require a permit modification and/or revisions include, but are not limited to, the following:

   a. Erection, fabrication, installation, addition, or modification of an emissions unit (which is the source, or part of it, which emits or has the potential to emit any regulated air pollutant), or of a source, where there is, or there is potential of, a resulting emissions increase;

   b. Reconstruction or replacement of any emissions unit or components thereof such that its capital cost exceeds 50% of the cost of a whole new unit;

c. Any change at a source which causes emission of a pollutant not previously emitted, an increase in emissions, production, throughput, hours of operation, or fuel use greater than those allowed by the permit, or by 9 VAC 5-80-11, unless such an increase is authorized by an emissions cap; or any change at a source which causes an increase in emissions resulting from a reduction in control efficiency, unless such an increase is authorized by an emissions cap;

d. Any reduction of the height of a stack or of a point of emissions, or the addition of any obstruction which hinders the vertical motion of exhaust;

e. Any change at the source which affects its compliance with conditions in this permit, including conditions relating to monitoring, recordkeeping, and reporting;

f. Addition of an emissions unit which qualifies as insignificant by emissions rate (9 VAC 5-80-720 B) or by size or production rate (9 VAC 5-80-720 C);

g. Any change in insignificant activities, as defined by 9 VAC 5-80-90 D.1.a(1) and 9 VAC 5-80-720 B and 9 VAC 5-80-720 C.

(9 VAC 5-80-110 G, 9 VAC 5-80-110 J, 9 VAC 5-80-240, and 9 VAC 5-80-260)

K. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege. (9 VAC 5-80-110 G.5)

L. Duty to Submit Information

1. The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality.
(9 VAC 5-80-110 G.6)

2. Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G.
(9 VAC 5-80-110 K.1)

M. Duty to Pay Permit Fees

The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-300 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-350. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the Department by **April 15** of each year. The calculations and final amount of emissions are subject to verification and final determination by the Department.
(9 VAC 5-80-110 H and 9 VAC 5-80-340 C)

N. Fugitive Dust Emission Standards

During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:

1. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;

2. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;

3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or other similar operations;

4. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,

5. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.

(9 VAC 5-40-90 and 9 VAC 5-50-90)

O. Startup, Shutdown, and Malfunction

At all times, including periods of startup, shutdown, soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility

including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
(9 VAC 5-50-20 E)

P. Alternative Operating Scenarios

Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1.
(9 VAC 5-80-110 J)

Q. Inspection and Entry Requirements

The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:

1. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.

2. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.

3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.

4. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9 VAC 5-80-110 K.2)

R. Reopening For Cause

The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than 18 months after promulgation of the

applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F.

1. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

2. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

3. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.

(9 VAC 5-80-110 L)

S. Permit Availability

Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.
(9 VAC 5-80-150 E)

T. Transfer of Permits

1. No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.
(9 VAC 5-80-160)

2. In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200.
(9 VAC 5-80-160)

3. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200.
(9 VAC 5-80-160)

U. Malfunction as an Affirmative Defense

1. A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the requirements of paragraph 2 of this condition are met.

2. The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:

   a. A malfunction occurred and the permittee can identify the cause or causes of the malfunction.

   b. The permitted facility was at the time being properly operated.

   c. During the period of the malfunction the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.

   d. The permittee notified the board of the malfunction within two working days following the time when the emission limitations were exceeded due to the malfunction. This notification shall include a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notification may be delivered either orally or in writing. The notification may be delivered by electronic mail, facsimile transmission, telephone, or any other method that allows the permittee to comply with the deadline. This notification fulfills the requirements of 9 VAC 5-80-110 F 2 b to report promptly deviations from permit requirements. This notification does not release the permittee from the malfunction reporting requirement under 9 VAC 5-20-180 C.

3. In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any requirement applicable to the source.

4. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any applicable requirement.

   (9 VAC 5-80-250)

V. Permit Revocation or Termination for Cause

A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe, any permit for any of the grounds for revocation or termination or for any other violations of these regulations.
(9 VAC 5-80-260)

W. Duty to Supplement or Correct Application

Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.
(9 VAC 5-80-80 E)

X. Stratospheric Ozone Protection

If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.
(40 CFR Part 82, Subparts A-F)

Y. Accidental Release Prevention

If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.
(40 CFR Part 68)

Z. Changes to Permits for Emissions Trading

No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.
(9 VAC 5-80-110 I)

AA. Emissions Trading

Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:

1. All terms and conditions required under 9 VAC 5-80-110, except subsection N, shall be included to determine compliance.

2. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.

3. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.

(9 VAC 5-80-110 I)